

**FILED**  
at 10:14 o'clock A M  
MAR 0 1 2017

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW MEXICO

United States Bankruptcy Court  
Albuquerque, New Mexico

In re:

Chapter 7

Michael Adam Arellano,

Case No.: 16-12720-t7

Debtor,

Adversary No.: 17-01006-t

**ANSWER TO COMPLAINT**

Charles J. Davis,

Plaintiff,

Vs.

Michael Adam Arellano,

Defendant.

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United States Bankruptcy Court  
Albuquerque, New Mexico

## **ANSWER TO COMPLAINT FOR NON-DISCHARABILITY OF DEBT**

### **GENERAL ALLEGATIONS**

1. On September 26<sup>th</sup>, 2016, Debtor retained Albuquerque Business Law, P.C., to file Chapter 7 Bankruptcy.
2. Debtor's petition was completed by Albuquerque Business Law, P.C., and filed with the District of New Mexico on October 31<sup>st</sup>, 2016.
3. Monies contributed to Tango, Inc. were used for development of the web platform. Funds were allocated as required for platform development, mobile application development, marketing expenses, video production and office space lease.
4. Web platform was coded by contracted developers for backend development, design, and algorithm sequences of the Tango Platform. Plaintiff's referral to wix.com was not used for the systems core functionality as the platform was designed from the ground up.

Wix.com provided the framework for the company's promotional website which was used for marketing purposes and served as a home base for early sign ups. From the wix.com website, once the platform was completed, would provide a sign up link which would then direct users to the platform developed sign up page. Upon account creation the user would have full access to the Tango platform which was developed.

Plaintiff was invited and attended a live demo of the platform on January 24<sup>th</sup>, 2014.

Plaintiff was provided a live link to the platform to test and provide feedback at their leisure on January 24<sup>th</sup>, 2016.

Plaintiff provided detailed feedback of platform after thorough review on January 31<sup>st</sup>, 2014.

On June 11<sup>th</sup>, 2014, Plaintiff was made of aware of the distinction between a Front end and Back end website clarifying any concerns of Wix.com being the platform used for development.

Wix.com does not provide the capabilities of the platform tested by Plaintiff as it is merely a website builder for Front end websites.

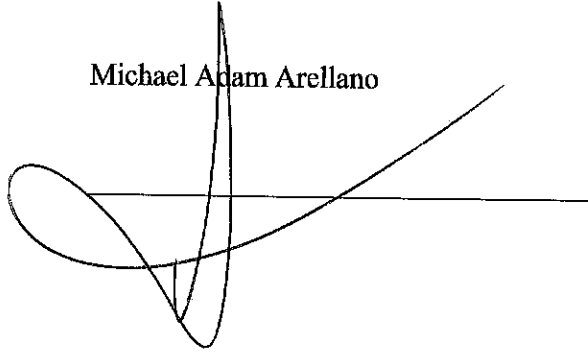
All source code of the Tango Platform have been preserved and archived.

5. Agreed to a repayment plan with Plaintiff, however, due to unforeseen circumstances failed to keep up with payment plan which resulted in Debtor Filing for Chapter 7 Bankruptcy.

Michael Adam Arellano  
224 Nico Trail NW  
Albuquerque, NM 87114

Dated: February 28<sup>th</sup>, 2017

Michael Adam Arellano

A handwritten signature in black ink, featuring a large, stylized loop on the left and a long, sweeping horizontal stroke extending to the right.